

Etan Zaitso [SBN 287106]
Attorney-at-Law

Zaitso Law
331 J Street, Suite 200
Sacramento, CA 95814
916.542.0270

Attorney for Defendant
MARSHA PHILLIPS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ESTEBAN GERARDO RAMIREZ, AKA
“ESTEBAN RAMIREZ VERDUZCO,” AND
MARSHA GARMA PHILLIPS,
Defendant.

Case No.: 2:22-CR-00055 DAD

**STIPULATION AND ORDER TO
CONTINUE SENTENCING AND
FILING DATES**

The parties, defendant Marsha Garma Phillips, by and through her counsel Etan Zaitso, Esteban Gerardo Ramirez, by and through his counsel Lupe Martinez, and the Government, by and through its counsel Adrian Kinsella, hereby stipulate as follows:

1. Defendants Ramirez and Phillips changed their pleas on November 8, 2022, and December 20, 2022, respectively.
2. Since then, the parties have stipulated to several continuances of the sentencing and filing dates, including the Draft PSR, based upon the requests and representations of counsel for each defendant.
3. The sentencing hearing for both defendants is now currently set for May 16, 2023.
4. Counsel for each defendant now request to move the sentencing date to July 18, 2023, with filing due dates also moved consistent with that date. It is defense counsels’

representation and belief that with an additional two months to finish their interviews, research, investigation, and preparation for sentencing, they will be ready for sentencing.

5. For these reasons, the parties agree that this sentencing continuance request shall be their last.
6. Probation has been notified of the requested continuance and filing dates as listed below and approves.
7. Based upon the representations of defense counsel, and with approval of Probation, the government is without objection.
8. Therefore, the parties agree and stipulate to the following schedule:

Sentencing Date: July 18, 2023,

Reply, or Statement of Non-Opposition: July 11, 2023,

Formal Objections: July 5, 2023,

Final Presentence Report: June 27, 2023,

Informal Objections: June 20, 2023,

Draft Presentence Report: June 6, 2023.

IT IS SO STIPULATED.

Dated: April 17, 2023

Respectfully submitted,

/s/ Etan Zaitso

ETAN ZAITSU

Attorney for Defendant

MARSHA GARMA PHILLIPS

Dated: April 17, 2023

Respectfully submitted,

/s/ Lupe Martinez

LUPE MARTINEZ

Attorney for Defendant

ESTEBAN GERARDO RAMIREZ

Dated: April 17, 2023

Respectfully submitted,

/s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney

ORDER

Based upon the representations of the parties, and good cause showing, the Court orders the sentencing hearings for defendants Esteban Gerardo Ramirez and Marsha Garma Phillips reset for July 18, 2023, with the filing due dates reset as follows: Draft Presentence Report: June 6, 2023; Informal Objections: June 20, 2023; Final Presentence Report: June 27, 2023; Formal Objections: July 5, 2023; Reply, or Statement of Non-Opposition: July 11, 2023.

IT IS SO ORDERED.

Dated: April 19, 2023

Dale A. Drozd
UNITED STATES DISTRICT JUDGE